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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

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CHASOM BROWN, *et al.*, individually and
on behalf of all similarly situated,

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Plaintiffs,

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v.

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GOOGLE LLC,

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Defendant.

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Case No. 4:20-cv-03664-YGR-SVK

[PROPOSED] ORDER GRANTING MOTION TO SEAL

Judge: Hon. Susan van Keulen, USMJ

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[PROPOSED] ORDER

Before the Court is Google LLC's Administrative Motion Requesting Leave to Deprecate a Defunct Field ("Motion"). Having considered the Motion, supporting declarations, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document	Text To Be Sealed	Basis for Sealing Portion of Document
Google LLC's Administrative Motion Requesting Leave to Deprecate	GRANTED as to the portions at: Pages 1:2, 1:8-14, 1:18, 1:23, 2:2, 2:5-26, 3:8-16	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of related Google's internal projects, internal databases, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, including anti-fraud services, and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices.
Declaration of Borbala Benko	GRANTED as to the portions at: Pages 1:13-17, 1:20-3:3	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of related Google's internal projects, internal databases, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and

[PROPOSED] ORDER GRANTING MOTION TO SEAL

		proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, including anti-fraud services, and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices.

SO ORDERED.

DATED: _____   _____

HON. SUSAN VAN KEULEN
UNITED STATES MAGISTRATE JUDGE